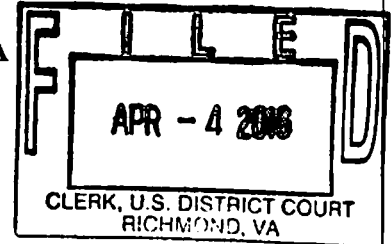


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)



JAMES M. BOLLING,

Plaintiff,

v.

BAKER, INC.

(d.b.a. BAKER DRIVETRAINS),

Defendant.

Civil Action No. 3:16cv199

NOTICE OF REMOVAL

Please take notice that the defendant, Baker, Inc., by counsel, hereby removes this action from the Circuit Court of Spotsylvania County where the matter is styled *James M. Bolling v. Baker, Inc. (d.b.a. Baker Drivetrains)*, CL2015-526, to the United States District Court for the Eastern District of Virginia, Richmond Division, pursuant to 28 U.S.C. §§ 1331, 1367, and 1446. In support thereof, the defendant states the following:

1. On June 8, 2015, the above referenced case was filed in the Circuit Court of Spotsylvania County, Virginia.
2. The defendant was served with the original Complaint by the Secretary of the Commonwealth on March 18, 2016, attached hereto as Exhibit A.
3. The United States District Court for the Eastern District of Virginia, Richmond Division, is the district and division in the Commonwealth of Virginia where the state action is now pending.
4. In his Complaint, the plaintiff alleges negligence (Count 1).
5. The United States District Court for the Eastern District of Virginia, Richmond Division, has jurisdiction over this claims by virtue of 28 U.S.C. § 1332, as plaintiff is a citizen of Spotsylvania

County, in the Commonwealth of Virginia, and defendant is a corporation that is incorporated and has its principle place of business in Ingham County, Michigan.

6. Pursuant to 28 U.S.C. § 1446(a), "a copy of all process, pleadings, and orders served upon such defendant" are attached to this Notice, and by reference made a part hereof.

7. This Notice is timely, pursuant to 28 U.S.C. § 1446(b)(1), and was filed within thirty (30) days of the initial service of process in this matter.

8. A jury trial has been demanded by the plaintiff in this matter.

9. Written notice of the filing of this Notice of Removal is being promptly given to all adverse parties, by counsel, and to the Clerk of the Circuit Court of Spotsylvania County, Virginia, as required by 28 U.S.C. § 1446(a). See Exhibit B.

WHEREFORE, defendant Baker, Inc., by counsel, hereby requests that the United States District Court for the Eastern District of Virginia, Richmond Division, assume jurisdiction over this matter, and make such other orders as are necessary and proper to determine this controversy.

Respectfully submitted,

BAKER, INC.
By Counsel

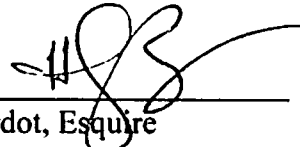


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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April, 2016, I sent by regular mail and fax a true copy of the foregoing to:

R. Jeffrey Grimstead, Esquire
Post Office Box 1313
Spotsylvania, Virginia 22553
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Counsel for Plaintiff



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